

EXHIBIT G

DANA KHOYI

UNITED STATES DISTRICT COURT

NORTHERN DIVISION OF TEXAS

DALLAS DIVISION

-----x

RESEARCH IN MOTION LTD.

and RESEARCH IN MOTION CORP.,

Plaintiff

vs.

EASTMAN KODAK COMPANY,

Defendant.

-----x

Videotape deposition of DANA KHOYI, taken before CINDY BERGLUND, CSR, Registered Professional Reporter and Notary Public pursuant to the applicable provisions of the Massachusetts Rules of Civil Procedure, at the offices of FISH & RICHARDSON, 225 Franklin Street, Boston, Massachusetts, on the 23rd day of September, 2009, commencing at 8:47 A.M.

DANA KHOYI

A P P E A R A N C E S

Counsel for the Plaintiff:

FISH & RICHARDSON, P.C.

1717 Main Street, Suite 5000

Dallas, Texas 75201

(214) 747-5070

reger@fr.com

BY: THOMAS H. REGER, II, ESQUIRE

Counsel for the Defendant:

K & L Gates LLP

925 Fourth Avenue, Suite 2900

Seattle, Washington 98104-1158

(206) 370-6688

douglas.greenswag@klgates.com

BY: DOUGLAS B. GREENSWAG, ESQUIRE

DANA KHOYI

(Appearances continued)

Counsel for the Defendant:

CROWELL & MORING LLP

1001 Pennsylvania Avenue, NW

Washington, DC 20004-2595

(202) 624-2786

cfindley@crowell.com

BY: CLYDE E. FINDLEY, ESQUIRE

VIDEOGRAPHER:

David Hanrahan

1 DANA KHOYI

2 of Crowell and Moring representing Kodak and Dana
3 Khoyi.

4 THE VIDEOGRAPHER: Okay, Cindy, if you could
5 swear in Mr. Khoyi.

6
7 DANA KHOYI, the witness, having first been duly
8 identified and sworn, deposes and states as
9 follows:

10
11 ATTY. REGER: Okay, before we begin, I want
12 to note that RIM recently received an offer to
13 review 94 boxes of materials from a prior
14 litigation involving a patent at issue in this
15 deposition. We also yesterday received five disks
16 of materials from that same patent litigation. We
17 have been asking for the materials since March.
18 We haven't had an opportunity to review the boxes
19 or the disks of materials.

20 My understanding is the disks include prior
21 art references that we expect to review and likely
22 supplement our invalidity contentions.

23
24 DIRECT EXAMINATION BY ATTY. REGER:
25